

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

HERMÈS INTERNATIONAL and
HERMÈS OF PARIS, INC.,

Plaintiffs,

v.

MASON ROTHSCHILD,

Defendant.

No. 22-cv-00384-JSR

**DECLARATION OF RHETT O.
MILLSAPS II**

I, RHETT O. MILSAPS II, hereby declare as follows:

1. I am the managing member of the law firm Lex Lumina PLLC, counsel to Defendant Mason Rothschild in this action. I make this declaration based upon my knowledge of matters in this action and to place before the Court the following documents.
2. Attached hereto as Exhibit A is a true and correct copy of Plaintiffs' proposed trial Exhibit 42.
3. Attached hereto as Exhibit B is a true and correct copy of Plaintiffs' proposed trial Exhibit 99.
4. Attached hereto as Exhibit C is a true and correct copy of Plaintiffs' proposed trial Exhibit 100.
5. Attached hereto as Exhibit D is a true and correct copy of excerpts from the deposition transcript of Boriana Guimberteau, dated September 14, 2022.
6. Attached hereto as Exhibit E is a true and correct copy of Plaintiffs' proposed trial Exhibit 288.

7. Attached hereto as Exhibit E is a true and correct copy of Plaintiffs' proposed trial Exhibit 285.

8. I declare under penalty of perjury that the foregoing is accurate to the best of my knowledge.

Dated: January 13, 2023

/s/ Rhett O. Millsaps II
Rhett O. Millsaps II